

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
) No.: 19 CR 980
 vs.)
)
 HAITAO XIANG,)
)
 Defendant.)

**DEFENDANT’S MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF
HIS MOTION TO SUPPRESS EVIDENCE**

Comes now the defendant Haitao Xiang, by and through his undersigned attorneys, and respectfully moves this Honorable Court for leave to file a reply in support of his Motion to Suppress Evidence (R. 93). In support, the following is offered:

1. On February 19, 2021, Mr. Xiang filed a Motion to Suppress Evidence (R.93) stemming from the search of his electronic devices after they were seized at O'Hare Airport. The government filed their response on March 5, 2021 (R. 99). The motion schedule set by this Court did not contemplate a time within which to file a reply.

2. The applicable law in this matter is novel and intricate. The government set forth both factual and legal assertions in their response that require Mr. Xiang to respond. Because it is Mr. Xiang's motion, he respectfully asks this Honorable Court the opportunity to reply to the government's response to his Motion

to Suppress Evidence.

3. Mr. Xiang is requesting that this Court allow him two weeks within which to file his reply. The requested deadline to file the reply is March 19, 2021.

Wherefore, for the reasons stated above, defendant Haitao Xiang is respectfully asking this Honorable Court for leave to file a reply in support of his Motion to Suppress Evidence (R. 93) by March 19, 2021.

Respectfully submitted,

/s/ Vadim A. Glozman

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CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2021, a true and correct copy of the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following: all Attorneys of record.

s/ Vadim A. Glozman